

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

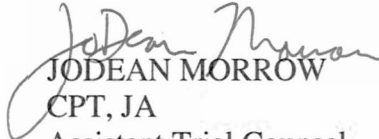
**Supplement to Government
in camera Motion for Authorization
of Redactions for the FBI File
under MRE 505(g)(2)**

14 September 2012

NOTICE TO THE COURT

1. This supplement responds to the Court's Order, dated 21 August 2012, relating to Government redactions of portions of the FBI investigative file pertaining to the accused. In accordance with the Order, the United States reviewed the redactions in the FBI investigative file, identified each proposed redaction by Bates number, and provided the Court with a justification for each proposed redaction. The list of redactions and justifications is contained in an enclosure to this notice, provided to the Court *ex parte* pursuant to the Government's Motion for Authorization of Redactions for the FBI File under Military Rule of Evidence 505(g)(2), Appellate Exhibit CCLXVI. *See* Enclosure 1. The United States did not identify whether proposed redactions were made available to the defense in discovery from another source, but instead has altered the redactions in the FBI file so that information provided to the defense in discovery from other sources is also available to the defense in the FBI file.
2. Of the 632 total documents originally provided to the defense in discovery from the FBI investigative file, 351 documents were disclosed without redactions. The remaining 281 documents had some portion redacted. The prosecution reviewed the 281 documents and grouped all the documents in four different folders on the disk provided at Enclosure 2. *See* Enclosure 2 [Disk]. Folder 1 contains the 351 documents originally disclosed to the defense without redactions. Folder 2 contains the 7 documents that were previously redacted which will now be unredacted and provided to the defense in full, although the grey boxes still appear on the documents. Folder 3 contains the 184 documents with no changes to the redactions. Folder 4 contains the 90 documents with changes to the redactions. When the Court reviews the material in Folder 4, the proposed redacted information will be in red redaction boxes and the information otherwise shown in grey (previously proposed for redaction) will be disclosed to the defense. Accordingly, the justification provided by the United States will only apply to the information contained within the specific red redaction box.
3. The list of redactions and justifications, submitted *ex parte*, includes five columns for ease of reference. The first column identifies, with an "X", those documents in category (2), listed above. The second column identifies the filename of the document. The third column identifies the Bates number of the page containing a redaction. The fourth column identifies the redaction number on the page, with "1" being the first redaction starting from the top of the page (i.e. one page may have multiple redactions with different justifications). The fifth column includes a justification for each specific redaction on each page.

4. The United States will not use any portion of the redacted information not disclosed to the defense during any portion of the trial. This includes rebuttal and rule of completeness if the defense introduces or references any of the unredacted information.


JODEAN MORROW
CPT, JA
Assistant Trial Counsel

2 Enclosures

1. List of Redactions and Justifications (classified "SECRET//NOFORN") [submitted *ex parte*]
2. Disk of FBI files for Court Review [submitted *ex parte*]